

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

:

- v. -

:

INFORMATION

AYRAT KHASANOV,

:

Defendant.

:

07 CRIM 809

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COUNT ONE.

The United States Attorney charges:

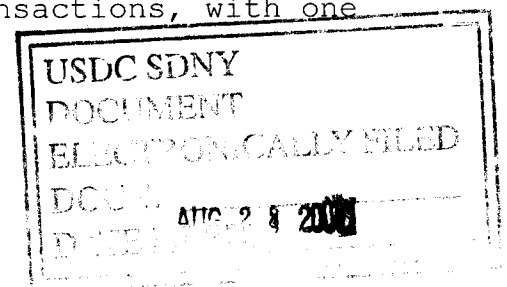
1. On or about June 6, 2007, in the Southern District of New York and elsewhere, AYRAT KHASANOV, the defendant, unlawfully, willfully, and knowingly, and with intent to defraud, did produce, traffic in, have control and custody of, and possessed device-making equipment, to wit, KHASANOV possessed two card writers with which he created counterfeit bank cards using stolen account information.

(Title 18, United States Code, Section 1029(a)(4).)

COUNT TWO

The United States Attorney further charges:

2. From in or about April 2007, up to and including in or about June 2007, in the Southern District of New York and elsewhere, AYRAT KHASANOV, the defendant, unlawfully, willfully, and knowingly, and with intent to defraud, in an offense affecting interstate commerce, did effect transactions, with one



and more access devices issued to another person and persons, to receive payment and any other thing of value during a one-year period the aggregate value of which is equal to and greater than \$1,000, to wit, KHASANOV used stolen bank account information to create counterfeit access devices with which he obtained money.

(Title 18, United States Code, Sections 1029(a)(5).)

COUNT THREE

The United States Attorney further charges:

3. From in or about September 2006, up to and including in or about March 2007, in the Southern District of New York and elsewhere, AYRAT KHASANOV, the defendant, and others known and unknown, unlawfully, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.

4. It was a part and object of the conspiracy that AYRAT KHASANOV, the defendant, and others known and unknown, unlawfully, willfully and knowingly, would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the moneys, funds, credits, assets, securities, and property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and

promises, in violation of Title 18, United States Code, Section 1344.

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal object thereof, the following over acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 11, 2006, AYRAT KHASANOV, the defendant, withdrew, from a bank account opened in another individual's name, money that he knew had been stolen.

b. On or about October 11, 2006, KHASANOV wired to co-conspirators in St. Petersburg, Russia, money he had withdrawn from another individual's bank account.

(Title 18, United States Code, Section 1349.)

COUNT FOUR

The United States Attorney further charges:

6. From in or about September 2006, through in or about March 2007, AYRAT KHASANOV, the defendant, and others known and unknown, unlawfully, wilfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, namely a scheme by which KHASANOV fraudulently obtained funds from banks, did transmit and cause to be transmitted by means of wire, radio, and

television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, on or about October 10, 2006, KHASANOV wired funds that he had withdrawn from fraudulent bank accounts to individuals in St. Petersburg, Russia by Western Union.

(Title 18, United States Code, Section 1343.)

COUNT FIVE

The United States Attorney further charges:

7. From in or about December 2006, up to and including in or about January 2007, in the Southern District of New York and elsewhere, AYRAT KHASANOV, the defendant, and others known and unknown, unlawfully, willfully and knowingly, with intent to defraud, in an offense affecting interstate commerce, did combine, conspire, confederate, and agree together and with each other to commit an offense under Title 18, United States Code, Section 1029(a)(2).

8. It was a part and object of the conspiracy that AYRAT KHASANOV, the defendant, and others known and unknown, unlawfully, willfully and knowingly, and with intent to defraud, in an offense affecting interstate commerce, would and did traffic in and use one or more unauthorized access devices during a one-year period, and by such conduct obtained a thing of value aggregating \$1,000 or more during that period, in violation of

Title 18, United States Code, Section 1029(a)(2).

Overt Act

9. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about December 15, 2006, AYRAT KHASANOV, the defendant, received and signed for the delivery of electronic equipment that he knew had been purchased using stolen credit card information.

(Title 18, United States Code, Sections 1029(b)(2).)

FORFEITURE ALLEGATION

10. As a result of committing the offenses alleged in Counts One through Five of this Indictment, AYRAT KHASANOV, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the bank fraud conspiracy, credit card fraud conspiracy, and aggravated identity theft offenses.

Substitute Asset Provision

11. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;  
it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982 and Title 18, United States Code, Sections 1029, 1343, 1349.)

A handwritten signature in black ink, reading "Michael J. Garcia", is written over a horizontal line.

MICHAEL J. GARCIA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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- v. -

AYRAT KHASANOV,

Defendant.

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INFORMATION

07 Cr.

(18 U.S.C. §§ 1029, 1343, 1349)

MICHAEL J. GARCIA  
United States Attorney.

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Waived indictment + filed information.  
Deft pleads guilty to information.  
No PSI ordered. ~~Waived~~ Bail  
Cont'd. Deft pleads guilty to information.  
AUSA Subanon pres. Russian IT  
pres. Freeman.

8/28/07  
(93)